

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES  
LITIGATION

Civil Action No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**THIRD JOINT STIPULATION REGARDING  
CLASS CERTIFICATION BRIEFING DEADLINES**

Lead Plaintiffs Plymouth County Retirement Association (“Plymouth County”) and the Trustees of the Teamsters Union No. 142 Pension Fund (“Teamsters 142”) (collectively, “Lead Plaintiffs”) and Defendants Apache Corporation (“Apache”), John J. Christmann, IV, Timothy J. Sullivan, and Stephen J. Riney (collectively, “Defendants” and, together with Lead Plaintiffs, the “Parties”) stipulate and agree as follows:

1. WHEREAS, on September 15, 2021, Judge Hanks referred all non-dispositive and dispositive pre-trial matters in this case to Magistrate Judge Edison (Dkt. 42).
2. WHEREAS, on December 19, 2022, the Court, Judge Edison presiding, issued a Docket Control Order (“DCO,” Dkt. 86) setting the Parties’ pre-trial briefing schedule.
3. WHEREAS, pursuant to the DCO, Lead Plaintiffs filed their Motion for Class Certification on April 7, 2023 (Dkt. 101).
4. WHEREAS, pursuant to the DCO and the June 8, 2023 Second Joint Stipulation and Order Regarding Class Certification Briefing Deadlines (the “Second Stipulation,” Dkt. 116): Defendants filed their Opposition to Class Certification on June 16, 2023 (Dkt. 117); Lead Plaintiffs are due to file their Reply in Support of Class Certification on August 4, 2023; and

Defendants are due to file their Sur-Reply in Opposition to Class Certification on September 1, 2023.<sup>1</sup>

5. WHEREAS, to complete certain discovery relevant to Lead Plaintiffs' Reply in Support of Class Certification, the Parties have agreed to further extend the deadline for Lead Plaintiffs' Reply by an additional seven days, to August 11, 2023.

6. WHEREAS, the Parties also wish to extend the subsequent class certification briefing deadlines by the same seven-day period.

7. WHEREAS, granting the relief requested herein will not affect any deadlines in the DCO other than those pertaining to Class Certification briefing.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their undersigned counsel, as follows:

8. Lead Plaintiffs will file their Reply in Support of Class Certification by August 11, 2023.

9. Defendants will file their Sur-Reply in Opposition to Class Certification by September 8, 2023.

IT IS SO STIPULATED.

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<sup>1</sup> Although the Court did not act upon the Second Stipulation, the Parties have adhered to it.

Dated: July 5, 2023

Respectfully submitted,

**BAKER BOTTS L.L.P.**

/s/ David D. Sterling

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*Co-Lead Counsel for Lead Plaintiffs*

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2023

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Hon. Andrew M. Edison  
United States Magistrate Judge